

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: FAP# 5H5080. Chlorpyrifos in food handling establishments. Comments on amendment of 9/5/75, including revised Sections B and F.

DATE: NOV 11 1975

FROM: A. Rathman, Chemist, Chemistry Branch
Registration Division (WH-567)

TO: Product Manager No. 12 (F. Sanders)
and Toxicology Branch

THRU: Chief, Chemistry Branch *gjm*

In our review of 7/28/75, we recommended for the proposed regulation contingent upon certain revisions in Sections B and F and clearance of the inerts under Title 21.

The petitioner has now revised both Sections B and F in line with our suggestions and this resolves our objections.

Additionally, the petitioner is requesting clearance, under CFR Title 21, of the inerts in the formulation as well as the oil [REDACTED] in the oil based sprays. In our deferral to TOX on the clearance of the inerts it was noted that considering the low levels of [REDACTED]

[REDACTED] we would not expect a residue problem.

However, we did suggest that information on the identity [REDACTED] be obtained. Additionally, considering the levels of xylene [REDACTED] in the formulations, some information should be obtained by the petitioner on the levels of these compounds that may result in foods. Identification of inhibited [REDACTED] was also considered necessary by CHM. The TOX memo of 8/19/75 does not explicitly state if the above data or information is required prior to clearance.

Recommendation

Contingent upon clearance of the inerts (as well as the oil and xylene which is listed as an active ingredient) and the resolution of the above listed deferrals to TOX, we recommend for the food additive regulation to permit the use of the insecticide chlorpyrifos (0,0-diethyl 0-(3,5,6-trichloro-2-pyridyl)phosphorothioate) in food handling establishments (including food service, food manufacturing, and food processing establishments, such as but not limited to restaurants, grocery stores, bakeries, bottling plants, grain mills, and canneries) where food and food products are held, processed, prepared or served. To assure safe use of the insecticide, application shall be limited to spot and/or crack and crevice treatments only. The spray concentration shall be limited to a maximum of 0.5% active ingredient. For

INERT INGREDIENT INFORMATION IS NOT INCLUDED

crack and crevice treatments, equipment capable of delivering a pin stream of insecticide should be used. For spot treatments, a coarse, low pressure spray should be used to avoid atomization or splashing of the spray. Contamination of food or food contacting surfaces should be avoided.

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